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June 5, 2013

Ms. Nicole Miller  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00004036  
RE: Amended 30-Day Post-General Report (10/18/2012-11/26/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to: (1) a payment on Schedule E that was not reflected on Schedule D, (2) the disclosure of in-kind contributions, (3) the possible failure to file 24-hour notices to disclose independent expenditures and (4) financial activity that was reflected on the wrong line of the Detailed Summary Page of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

Specifically, as to the first matter, the Commission has inquired about payments made to The Dover Group for independent expenditures that were disclosed on Schedule E but not on Schedule D. An inadvertent data entry error prevented the disclosure of the debt payment on the amended report, but, a revised amended report has been filed to disclose the debt payment.

As to the second matter, the Commission has noted that in-kind activity disclosed on Schedule B, supporting Line 23 of the report may be incorrectly reported. The ""memo"" designation was used on these two in-kind contributions because the in-kinds had been made, but, the vendors had not been paid by the end of the reporting period. As such, the committee has added these vendors to Schedule D on the newly filed amended report.

On the third matter, the Commission has suggested that the committee may have failed to file required 24-hour reports to disclose independent expenditures. As the committee noted on the original Post-General Report and subsequent amended reports, these two independent expenditures were originally disclosed on 48-Hour Notices filed on October 19, 2012, by an SEIU COPE's affiliated committee, Service Employees International Union PEA-Federal (C00523621). We have disclosed these payments on Schedule E based on a telephone conversation and guidance provided by the Service Employees International Union PEA-Federal's FEC Reports Analyst, Rosa Lewis. You can view the disclosure of these two independent expenditures on the 48-Hour Notices using image numbers 12960560323 and 12960560324.

With regard to the fourth and final matter, the Commission noted that a category of financial activity was disclosed on the wrong line number of the Detailed Summary Page. This transaction was inadvertently disclosed on Line 16 instead of Line 17. The committee has filed a new amended report to correct this error.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider  
Counsel for SEIU COPE

cc: Eliseo Medina, Treasurer, SEIU COPE

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